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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PENNY ANN BRADLEY

Debtor.

Chapter 11

Case No. 18-10122 (JLG)

**NOTICE OF PRESENTMENT OF FIFTH STIPULATED CONSENT
ORDER FURTHER EXTENDING THE TIME WITHIN WHICH
ATLAS UNION CORP. MAY FILE A COMPLAINT TO DETERMINE
THE DISCHARGEABILITY OF DEBTS PURSUANT TO 11 U.S.C. § 523(c)**

PLEASE TAKE NOTICE that Atlas Union Corp. (“Atlas”), by and through its undersigned counsel, will present the accompanying fifth stipulated consent order (the “Consent Order”) pursuant to Rules 4007(c) and 9006(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) further extending the time within which Atlas may file a complaint to determine the dischargeability of debts pursuant to section 523(c) of the Bankruptcy Code, for signature to the Honorable James L. Garrity, Jr., United States Bankruptcy Judge for the Southern District of New York, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 601, New York, New York 10004 (the “Bankruptcy Court”) on **January 30, 2020, at 12:00 p.m. (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that any responses or objections (“Objections”) to the Consent Order shall be in writing, shall conform to the Bankruptcy Rules and the Local

Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with General Order M-399, so as to be filed and received no later than **January 29, 2020, at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and received by the Objection Deadline, the relief requested herein may be granted without further notice or a hearing. If a written objection, in conformity with the above-referenced procedures, is timely filed and served, the Court will notify Atlas and the objecting parties of the date and time of any hearing. Atlas and any objecting parties are required to attend the hearing; failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: January 23, 2020
New York, New York

COLE SCHOTZ P.C.

By: /s/ Jacob S. Frumkin
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EXHIBIT A

Proposed Stipulated Consent Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PENNY ANN BRADLEY

Debtor.

Chapter 11

Case No. 18-10122 (JLG)

**FIFTH STIPULATED CONSENT ORDER
FURTHER EXTENDING THE TIME WITHIN WHICH
ATLAS UNION CORP. MAY FILE A COMPLAINT TO DETERMINE
THE DISCHARGEABILITY OF DEBTS PURSUANT TO 11 U.S.C. § 523(c)**

RECITALS

A. On January 18, 2019, Penny Ann Bradley ("Debtor") commenced a voluntary case under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

B. The first date set for the meeting of creditors under section 341(a) of the Bankruptcy Code was April 16, 2019. Pursuant to Rule 4007(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the time within which Atlas Union Corp. ("Atlas"), a creditor and party in interest in the Debtor's case, must file a complaint to determine the dischargeability of a debt under section 523(c) of the Bankruptcy Code was initially set to expire on June 17, 2019 (the first business day after the weekend day (Saturday, June 15, 2019) on which the period prescribed by Bankruptcy Rule 4007 was initially set to end in this case) (the "523(c) Deadline").

C. On June 13, 2019, Atlas filed a *Notice of Presentment of Stipulated Consent Order Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine*

the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c) [Docket No. 118], seeking Court approval of a stipulated consent order extending the 523(c) Deadline to September 30, 2019.

D. On July 9, 2019, the Court entered the *Stipulated Consent Order Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 126] pursuant to which, among other things, the 523(c) Deadline, as it pertains to Atlas, was extended through and including September 30, 2019.

E. On September 26, 2019, Atlas filed a *Notice of Presentment of Stipulated Consent Order Further Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 176], seeking Court approval of a stipulated consent order further extending the 523(c) Deadline to November 26, 2019.

F. On October 3, 2019, the Court entered the *Stipulated Consent Order Further Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 182] pursuant to which, among other things, the 523(c) Deadline, as it pertains to Atlas, was further extended through and including November 26, 2019.

G. On November 4, 2019, Atlas filed a *Notice of Presentment of Third Stipulated Consent Order Further Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 196], seeking Court approval of a stipulated consent order further extending the 523(c) Deadline to January 8, 2020.

H. On November 15, 2019, the Court entered the *Third Stipulated Consent Order Further Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 199] pursuant to which, among other things, the 523(c) Deadline, as it pertains to Atlas, was further extended through and including January 8, 2020.

I. On December 9, 2019, Atlas filed a *Notice of Presentment of Fourth Stipulated Consent Order Further Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 219], seeking Court approval of a stipulated consent order further extending the 523(c) Deadline to February 7, 2020.

J. On January 2, 2020, the Court entered the *Fourth Stipulated Consent Order Further Extending the Time Within Which Atlas Union Corp. May File a Complaint to Determine the Dischargeability of Debts Pursuant to 11 U.S.C. § 523(c)* [Docket No. 226] pursuant to which, among other things, the 523(c) Deadline, as it pertains to Atlas, was further extended through and including February 7, 2020.

K. The Debtor and Atlas have agreed to further extend the 523(c) Deadline as set forth below pursuant to Bankruptcy Rule 4007(c), without prejudice to further extension.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned in consideration of the recitals, and subject to the approval of the Bankruptcy Court, as follows:

1. The 523(c) Deadline, as it pertains to Atlas, is further extended through and including March 7, 2020, pursuant to Bankruptcy Rule 4007(c).

2. The relief granted by this Order is without prejudice to Atlas's right to seek further extension of the 523(c) Deadline and the Debtor's right to oppose a further extension of that deadline.

3. This Court retains jurisdiction to hear and determine all matters arising from or related to this Stipulation and Order.

Dated: January 23, 2020

COLE SCHOTZ P.C.

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Counsel for Penny Ann Bradley

By: /s/ Daniel S. Alter

SO ORDERED THIS ____ DAY OF _____, 2020

HONORABLE JAMES L. GARRITY, JR.
UNITED STATES BANKRUPTCY JUDGE